

DANIEL G. BOGDEN
United States Attorney
BRADLEY W. GILES
Assistant United States Attorney
333 Las Vegas Blvd., South, Ste. 5000
Las Vegas, Nevada 89101
(702)388-6300 / Fax: (702)388-6698

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,)	2:11-cr-0310-JCM-RJJ
)	
Plaintiff,)	JOINT PROTECTIVE ORDER RE:
)	VIDEO RECORDINGS OF UNDERCOVER
vs)	TRANSACTIONS (AMENDED TO ADD
)	ATTORNEY GABRIEL GRASSO)
JACOB LILL;)	
EDMUND SCHROBACK;)	
CHRISTOPHER GREEN;)	
KYLE LAIR; and)	
ANA MARTINEZ)	
)	
)	
Defendants)	

The parties having met and conferred regarding the content of video recordings to be released as supplemental discovery in this matter, hereby agree that the Government, upon this Court's approval of this Protective Order, will release to undersigned defense counsel within ten (10) days, supplemental discovery including video recordings of controlled purchases of marijuana by undercover agents.

By signing this Protective Order, defense counsel agree that the above-referenced materials will be maintained by their offices and associates in the strictest confidence. Access to these materials will be limited to counsel, defendants, investigators, paralegals, experts and other individuals who have been retained or appointed by the Court to represent the defendants, and who

1 will be provided a copy of this Order. Counsel further agree that these materials will not be copied
2 or publically disseminated (other than for use directly in court proceedings). Furthermore, copies of
3 the videos may not be provided directly to the individual Defendants, including the Defendants who
4 are parties to this agreement, until such time as the Government agrees to such disclosure and/or it
5 is ordered by the Court.

6 For parties who are not signatories to this agreement, copies of these materials will be
7 maintained at the United States Attorneys Office, where they have been made available for viewing.

8
9 Respectfully Submitted this 6th day of June, 2012.

10 DANIEL G. BOGDEN
11 United States Attorney

12 /s

13

Bradley W. Giles
Assistant United States Attorney

14 Dated: 5/31/12

15 /s

16 Michael Cristalli
Attorney for: Jacob Lill

17 Dated: 5/31/12

18 /s

19 Paola M. Armeni
Attorney for: Edmund Schroback

20 Dated: 5/31/12

21 /s

22 Mace J. Yampolsky
Attorney for: Christopher Green

23 Dated: 5/31/12

24 /s

25 Karen Winckler
Attorney for: Kyle Lair

26 Dated: 6/6/12

/s

Gabriel Grasso
Attorney for: Ana Martinez

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA

Plaintiff,

vs

JACOB LILL;
EDMUND SCHROBACK;
CHRISTOPHER GREEN;
KYLE LAIR; and
ANA MARTINEZ

Defendants

2:11-cr-0310-JCM-RJJ

PROTECTIVE ORDER RE: VIDEO
RECORDINGS OF UNDERCOVER
TRANSACTIONS

Based on the pending stipulation of the parties, and good cause appearing therefore,

IT IS HEREBY ORDERED that:

Ten days from the date of this Order, the Government shall release to signatory defense counsel supplemental discovery including video recordings of controlled purchases of marijuana by undercover agents.

IT IS FURTHER ORDERED that:

The video recordings released pursuant to the supplemental discovery package shall be maintained in the strictest confidence. Access to the recordings shall be limited to counsel, defendants, investigators, paralegals, experts and other individuals who have been appointed by the Court to represent the signatory defendants, and who shall be provided with a copy of this Order.

1 **IT IS FURTHER ORDERED** that:

2 While the Defendants may view the videos of these transactions, they shall not be
3 provided with a copy of these materials. Furthermore, none of these materials may be publically
4 displayed or disseminated, except when used in direction connection with legal proceedings before
5 this Court. There shall be no further dissemination of these materials unless and until such time as
6 the Government agrees to such disclosure and/or it is ordered by the Court.

7
8 DATED this ____ day of _____, 2012.

9
10 _____
11 UNITED STATES MAGISTRATE JUDGE
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26